# **Data Sources and Methods**

In an effort to comprehensively address the task of recommending accreditation standards for Human Research Review Programs (HRRPs), the committee reviewed and considered various data sources in a concerted effort to cast a broad net for the collection and assessment of information. These sources included presentations before the committee from interested organizations, individuals, and federal agencies as well as formal public comments; a review of relevant literature; and commissioned draft standards for accreditation. A summary description of the committee's evidence-gathering methods follows.

## PRESENTATIONS AND PUBLIC COMMENT

Over the course of the study, the committee requested and received written responses and presentations from organizations and individuals representing many perspectives of accreditation and human subjects protections in general. The committee felt it was important to receive as much input as possible from public and private groups involved with or seeking involvement in the accreditation process and human subjects protections, as well as from health professional and other organizations. To accomplish this, the committee convened a public meeting on December 18, 2000 and a larger public forum on January 22, 2001 to gather information and hear from groups and individuals. The speakers at these meetings are listed in Box A-1.

#### **BOX A-1** Organizations and Individuals Appearing Before the Committee

## December 18, 2000

Sanford Chodosh, Public Responsibility in Medicine and Research

Michael Hamm, Michael Hamm and Associates

David Korn, Association of American Medical Colleges

Greg Koski, HHS Office for Human Research Protections

Charles McCarthy, Kennedy Institute of Ethics

Richard Rettig, RAND Corporation

Marjorie Speers, National Bioethics Advisory Commission

Mark Yessian, HHS Office of Inspector General

### January 22, 2001

Jessica Briefer French, National Committee for Quality Assurance

Jim Burris, Department of Veteran Affairs

Marie M. Cassidy, Citizens for Responsible Care and Research

Steve Erickson, Boston College

William L. Freeman, Indian Health Service

Edward F. Gabriele, Naval Medical Research Center

Peter Goldschmidt, Medical Care Management Corporation

Vera Hassner Sharav, Citizens for Responsible Care and Research

John Isidor, Shulman and Associates IRB, Inc.

Jonathan Knight, American Association of University Professors

David Lepay, Food and Drug Administration

Felice Levine, American Sociological Association/ Consortium of Social Science Associations

John R. Livengood, Centers for Disease Control and Prevention

Barbara J. LoDico, University of Medicine and Dentistry of New Jersey

Dan Masys, University of California, San Diego

Cherlyn Mathias, Private Citizen

Nick Reuter, Substance Abuse and Mental Health Services Administration

Philip Rubin, National Science Foundation

John Smith, Morehouse School of Medicine

David P. Stevens, Association of American Medical Colleges

Irene Stith-Coleman, Department of Health and Human Services

Margaret VanAmringe, Joint Commission on Accreditation of Health Organizations

Myrl Weinberg, National Health Council

#### February 21, 2001

Greg Koski, HHS Office for Human Research Protections

Belinda Seto, NIH Office of Extramural Research

During the first committee meeting, a number of speakers addressed the history of human subjects protections; the industrialization of clinical research; and provided overviews of the HHS Office of Inspector General activities, the HHS Office of Human Research Protections (OHRP), and accreditation processes; among other topics.

At the second meeting, the committee convened a public forum in order to hear a variety of perspectives on the preliminary draft accreditation standards formulated by Public Responsibility in Medicine and Research (PRIM&R), the accreditation process, and the protection of human research subjects. Over 125 people attended the meeting. Representatives of government and regulatory organizations, private accrediting groups, associations, institutions, IRBs, social science groups, research participants, and investigators made short presentations that were subject to comment and questioning from the committee and audience.

In order to include as many people and groups as possible, the committee sent out a mailing that included an announcement of the public forum, a one-page description of the study, the committee roster, and a cover letter explaining the committee's purpose for requesting the information. The letter was sent to a variety of interested people and groups via fax, email, and listservs, and asked those interested to send or fax comments pertinent to the committee's task and to respond to the PRIM&R draft standards for accreditation. The committee also used the project website [www.iom.edu/hrrp] to elicit comments on the project and the draft standards by providing project details, contacts, and links to pertinent information. The materials submitted to the committee supplemented those obtained by the committee through the literature review and public meetings.

A small portion of the third committee meeting was held in open session to hear additional comments from project sponsors.

In addition to the participants listed in Box A-1, many other individuals attended and participated in the public meetings, and/or provided written information to the committee. All registered participants for the January 2001 forum are listed below:

Aronson, Debra

Ashe, Warren K. Howard University School of Medicine

Bailey, Veronica Children's Hospital, Washington, D.C. IRB

Berger, Douglas National Bioethics Advisory Commission

Brooks, Tricia Capitol Associates, Inc. Brown, Rachel Association of Independent Research Institutes

Bruinooge, Suanna S. American Society of Clinical Oncology

Burkom, Diane
Battelle Centers for Public Health
Research and Evaluation

Byerly, Wesley G. Wake Forest University School of Medicine Caia, Matt

Committee on National Statistics, National Academy of Sciences

Cantor, Michael

Veterans Health Administration National Center for Ethics

Carley, John M.

U.S. Environmental Protection Agency

Carpentier, Richard

National Council on Ethics in

Human Research

Chesley, Francis D., Jr.

Agency for Healthcare Research

and Quality

Chodosh, Sanford

Public Responsibility in

Medicine and Research

Cohen, Jeffrey

Office for Human Research

**Protections** 

Coleman, Laura

Eli Lilly and Co.

Cuccherini, Brenda A.

Veterans Health Administration

Daly, Nancy

American Society of Therapeutic

Radiology and Oncology

DeCrappeo, Anthony

Council on Governmental

Relations

DeRenzo, Evan G

Washington Hospital Center

Dessaint, Danelle

Division of Behavioral and Social Sciences and Education, NAS

deWolf, Virginia A.

NRC Committee on National

Statistics

Dinsdale, Henry

National Council on Ethics in

Human Research

Dong, Bertha

U.S. General Accounting Office

Dunn, Cindy M.

University of Rochester

Dustira, Alicia K.

Office of Research Integrity

Eaglen, Robert

Liaison Committee on Medical

Education

Eckenwiler, Lisa A.

Old Dominion University

Erickson, Stephen

Boston College

Feldman, Laura S.

National Association of Children's

Hospitals

Fish, Bob

U.S. Army Medical Research and

Materiel Command

Fleming, Yolanda A. National Medical Association

Foote, Donna Newsweek Magazine

Furtek, Edward University of California, San Diego

Gallegos, Alice SUNY Stony Brook

Gasparis, George Office of Human Research Protections

Gelb, Romy U.S. General Accounting Office

Gemski, Liz Capitol Associates

Goebel, Paul W., Jr.
Office of Human Research
Protections

Gordon, Daniel M.
Walter Reed Army Institute of
Research

Gordon, Valery M.
Office of Extramural Programs,
OER, OD, NIH

Gottfried, Kate Office for Human Research Protections

Graziano, Alfred S. Jr. U.S. Air Force

Gross, Lauren G. American Association of Immunologists

Hamm, Michael Michael Hamm and Associates/PRIM&R

Han, Sang National Association of State Universities and Land-Grant Colleges

Harpel, Richard National Association of State Universities and Land-Grant Colleges

Hartnett, Terry Clinical Trials Advisor

Hauck, Robert J. P. American Political Science Association

Higgins, Yvonne K. U.S. Air Force

Hurt, Valerie

Kalf, George F. Thomas Jefferson University

Kaneshiro, Julie Office of Science Policy, NIH

Kester, Kent E. Walter Reed Institute of Research

Khin-Maung-Gyi, Felix Chesapeake Research Review, Inc. Kohn, Adam M. Shaw Pittman

Kuehl, Patricia PAREXEL International

Kulakowski, Elliott C. Society of Research Administrators International/ Albert Einstein Healthcare Network

Lechter, Karen Food and Drug Administration

Lee, Bonnie M. Food and Drug Administration

Levine, Jen
Washington Drug Letter
Linde-Serge, Marian
Food and Drug Administration

Lorden, Joan F. Ph. D. University of Alabama at Birmingham

Macko, Gail Tactical Research, LLC

McFarland, Jeff Society of Research Administrators International

Meyer, Roger E. Association of American Medical Colleges

Milstein, Alan Sherman, Silverstein, Kohl, Rose & Podolsky Mitchell, Marcus Glaxo-SmithKline

Mitchell, Mary H. Harvard University

Morgan, Charlene Department of Navy, Bureau of Medicine and Surgery

Nightingale, Stuart Department of Health and Human Services

Noble, Gary R. Johnson & Johnson

Noble, John H., Jr. Catholic University of America Okie, Susan Washington Post

Overbey, Mary Margaret American Anthropological Association

Panicker, Sangeeta American Psychological Association

Papagni, Paul Columbia University/New York Presbyterian Medical Center

Patel, Nilam Agency for Healthcare Research and Quality

Patterson, Wayne The University of Texas Medical Branch at Galveston

Paulsen, Cindy University of Chicago

Perricord, Douglas Quintiles Transnational

Polmar, Suzanne K. Yale University

Pospisil, George C. National Institute of Neurological Disorders and Stroke, NIH

Powell, James H. National Medical Association

Puglisi, Tom PricewaterhouseCoopers

Radcliffe, Sara PhRMA

Reid, Ken
Bioresearch Monitoring Report

Russel-Einhorn, Michele PricewaterhouseCoopers

Sanford, Sandra NCQA

Scanley, Anne National Institute of Allergy and Infectious Diseases

Scharke, Cliff Office for Human Research Protections

Schrode, Kristi Bennet, Turner & Coleman, LLP Schwartz, Harvey A.

Agency for Healthcare Research
and Quality

Seto, Belinda National Institutes of Health

Shamoo, Adil E. University of Maryland School of Medicine

Sharpe, Angela Consortium of Social Science Associations

Shawver, Mary N. Diamond Healthcare Corporation

Sherwin, Joseph R. University of Pennsylvania

Siang, Sanyin American Association for the Advancement of Science

Silver, Howard J. Consortium of Social Science Associations

Simonson, Kristin American Society of Therapeutic Radiology and Oncology

Skedvold, Paula National Institutes of Health Office of Behavioral and Social Sciences Research

Skelton, Margaret Ann School of Medicine and Health Sciences, George Washington University Smedberg, Paul National Health Council

Spilker, Bert PhRMA

Stith-Coleman, Irene Department of Health and Human Services

Straf, Miron L.
Directorate for Social, Behavioral, and Economic Sciences,
National Science Foundation

Studer, Evelyn Research Triangle Institute

Swanson, Dennis University of Pittsburgh Institutional Review Board

Turman, Richard J. Association of American Universities

Vincent, Angela National Medical Association Waterman, Paula Department of Veterans Affairs, Office of Research Compliance and Assurance

Weiner, Susan L. The Children's Cause, Inc.

Wenner, Karen A. McKesson HBOC Pharmaceutical Partners Group

Wichman, Alison NIH Office of Human Subjects Research

Wingard, Jennifer National Association of State Universities and Land Grant Colleges

Zarin, Deborah Agency for Healthcare Research and Quality

Zimmerman, Janet F. IMPACT Consulting Group

The following people and organizations submitted written comments to the committee about accreditation programs and/or the PRIM&R Standards:

American Political Science Association

Association of American Universities/Council on Governmental Relations/ National Association of State Universities and Land Grant Colleges

Citizens for Responsible Care & Research

Cornblath, David R. Johns Hopkins Medicine

Eckenwiler, Lisa A. Old Dominion University

Erickson, Stephen Boston College

Feussner, John R. Department of Veterans Affairs, Veterans Health Administration

Freeman, William Indian Health Service

Gabriele, Edward F. Naval Medical Research Center

Kulakowski, Elliott C. Society of Research Administrators International

Levine, Felice J.

American Sociological Association/ Consortium of Social
Science Associations

National Medical Association Oakes, David A. Stanford University

Overbey, Mary Margaret American Anthropological Association Patterson, Wayne
The University of Texas Medical
Branch at Galveston
Richards, R. Henry
American Academy of
Pharmaceutical Physicians
Rubin, Phillip
National Science Foundation

Ryan, Stephen J. University of Southern California

Swanson, Dennis University of Pittsburgh

Shopes, Linda Pennsylvania Historical & Museum Commission

Townsend, Ardis Noreen Private Citizen

Vasgird, Daniel R. Research Foundation of the City University of New York

Weinberg, Myrl National Health Council

All written materials presented to the committee were reviewed and considered with respect to the task. This material can be examined by the public. The public access files are maintained by the National Research Council Library at 2001 Wisconsin Avenue, N.W., Harris Building, Room HA 152, Washington, DC 20007; tel: (202) 334-3543.

## LITERATURE REVIEW

In order to be thorough in their review, the committee conducted multiple literature searches and read numerous articles, book chapters, and reports concerning the protection of human subjects of research and its components during the course of the study. The materials provided addressed topics including the history of human subjects protections; the laws, processes, and groups that regulate human research; critiques of the current system for protecting human

research subjects; sample accreditation programs; and ethical issues surrounding human research.

# DRAFT STANDARDS FOR ACCREDITATION

Due to the fast-track nature of this study, the Institute of Medicine sought to assist the committee in completing its task in a timely manner. For this reason, the IOM funded the completion of a two-year effort by PRIM&R to establish accreditation standards. The resulting standards were intended to assist the committee in its deliberations about accreditation strategies and their strengths and weaknesses.

In addition, in the course of the committee's analysis, the draft standards developed by NCQA under contract with the Department of Veterans Affairs were provided to the committee for inclusion in their assessment of accreditation standards.